To: Borkovich, John@Waterboards[John.Borkovich@waterboards.ca.gov]

Cc: Albright, David[Albright.David@epa.gov]; Couch, Scott@Waterboards[Scott.Couch@waterboards.ca.gov]; Zinky, Janice@Waterboards[Janice.Zinky@waterboards.ca.gov]; Rodgers, Clay@Waterboards[Clay.Rodgers@waterboards.ca.gov]; Schlegel, Brandon@Waterboards[Brandon.Schlegel@Waterboards.ca.gov]; Bishop, Jonathan@Waterboards[Jonathan.Bishop@waterboards.ca.gov]

From: Dermer, Michele

Sent: Mon 12/29/2014 11:52:34 PM

Subject: RE: Elk Hills Power Plant Class I UIC Wells

Very much appreciated John. Yes, I was aware that there is a AE request package that was compiled by California Resources. We've not seen it as it is undergoing State review. As such, I am also uncertain if it will be applicable to the injection of Class I fluids.

Thanks again for your assistance.

Sincerely,

Michele

From: Borkovich, John@Waterboards [mailto:John.Borkovich@waterboards.ca.gov]

Sent: Monday, December 29, 2014 3:39 PM

To: Dermer, Michele

Cc: Albright, David; Couch, Scott@Waterboards; Zinky, Janice@Waterboards; Rodgers, Clay@Waterboards; Schlegel, Brandon@Waterboards; Bishop, Jonathan@Waterboards

Subject: RE: Elk Hills Power Plant Class I UIC Wells

Hi Michele

We have not received the expanded list of UIC (class II) wells to review from DOGGR (should be soon, so this specific field was not on our radar yet. That being said we have reviewed a draft request from Calif. Resources for an aquifer exemption in the Elk Hills Oil field for portions of the Tulare Fm.

In the meantime, I've asked staff to	conduct a preliminary	review if any wa	ter wells are within a
mile of the injectors using GeoTrac	ker database.		

John

From: Dermer, Michele [mailto:Dermer.Michele@epa.gov]

Sent: Monday, December 29, 2014 1:40 PM

To: Borkovich, John@Waterboards

Cc: Albright, David

Subject: Elk Hills Power Plant Class I UIC Wells

Hello John,

You are likely aware that EPA issued a permit for four Class I injection wells at the Elk Hills Power Plant in Kern Co. back in 2001. One well has subsequently been plugged and abandoned, however three wells are still injecting process-related fluids into the Tulare Formation in the Elk Hills field. As part of our review of the operator's renewal application we discovered that these wells are injecting into a formation that is not exempt. This situation is nearly identical to the statewide Class II issue, except these are the only three wells in CA that EPA has permitted that are injecting into an non -exempt aquifer. There are quite a few Class II wells in close proximity to these three wells that are injecting Class II fluids into the same formation, and you may have already conducted this type of survey for DOGGR, but to be consistent we are requesting this information as well.

Specifically, EPA would like the Water Board to conduct a well inventory survey in the vicinity of these three Class I wells, similar to the effort underway for the Class II wells. The wells are located in Section 18, T. 31S, R 24E, NW ¼ in Kern County, CA. Attached is a map. The Class I wells are 25A-18G; 35A-18G and 35-18G.

Please let me know if you have any questions. Thanks for your help with this.

Sincerely,

Michele Dermer

Michele Dermer

Drinking Water Protection Section

EPA Region 9

(415) 972-3417

Dermer.michele@epa.gov